

**ATTACHMENT A**  
**Statement of Facts: Rodney Lee White**

*The United States and the Defendant, **RODNEY LEE WHITE**, stipulate and agree that if this case proceeded to trial, the United States would prove the facts set forth below beyond a reasonable doubt. They further stipulate and agree that these are not all of the facts that the United States would prove if this case proceeded to trial.*

At all relevant times to this case, the Defendant, **RODNEY LEE WHITE** ("**WHITE**"), was a resident of Greenbelt (Prince George's County), Maryland.

From at least June 2015 through at least January 2016, **WHITE**, who at time posed as a teenaged female named "Lauren," used social media sites, including Instagram and ooVoo, to persuade, induce, entice, and coerce more than five male victims between the ages of 12 and 14 to send **WHITE** sexually explicit images of themselves over the Internet. The following are representative examples of **WHITE**'s communications with the victims.

**Victims A, B, and C**

On June 26, 2015, **WHITE** sent Victim A (then a 12-year-old male) a friend request on Instagram, pretending to be a teenage female named "Lauren" and stating that "she" was a neighbor of Victim A's uncle. Eventually, **WHITE** and Victim A began to chat on ooVoo, where **WHITE** used the handle "lauren\_md2000." Between June 26 and July 5, 2015, **WHITE**, posing as "Lauren," and Victim A engaged in a number of sexually explicit chats on ooVoo, during which **WHITE** sent Victim A images of child pornography as examples in order to entice Victim A to take and send pornographic photos of himself in response. **WHITE** succeeded, and Victim A produced images depicting Victim A's genitals, which Victim A sent to **WHITE**'s "Lauren" persona.

For example, on June 26, 2015, **WHITE**, posing as "Lauren," asked Victim A, "are u hard again?" Victim A responded, "not yet, . . . but im kinda getting there." **WHITE** replied, "mmm hot. Full nude pic now. I'll send mine if u do. No games." Victim A asked, "wht part wil u send," to which **WHITE** responded, "Pussy." Victim A agreed to send a photo. The next day, on June 27, 2015, Victim A sent an image that depicts Victim A standing nude in front of a bathroom mirror; the sink is visible in the image, Victim A's torso is visible and his genitals are exposed. **WHITE**, still posing as "Lauren," responded, "kinda hard to see try pointing at mirror so can see it better pls." Victim A expressed being nervous, and **WHITE** wrote, "I have one of my friend who is 14 that he sent me from mirror. Want to see it so u know how the pic came out?" Victim A replied, "um i guess." **WHITE** sent to Victim A an image that depicts a nude minor male standing in front of a mirror of a bathroom holding a cell phone in one hand and holding his erect penis in the other hand, and wrote to Victim A, "maybe like that will look better." Victim A again told **WHITE** he was nervous; **WHITE** then sent another image that depicts the same nude minor male standing in front of the bathroom mirror holding a cell phone in one hand with his genitals exposed, and told Victim A not to be nervous. Victim A responded, "thx but u said u would send one too." **WHITE** wrote, "Yes I will but send one like above pls." Victim A indicated he would



do so later. **WHITE**, still posing as Lauren, continued to chat with Victim A, including asking Victim A questions about whether he had compared the size of his penis with his friends, and wrote that Rod – referring to himself, **WHITE** – had sent “her” photos of his penis.

On June 29, 2015, **WHITE**, again posing as “Lauren,” engaged in another ooVoo chat with Victim A. **WHITE** wrote, “your friend [Victim C] sent me a few pics of his dick, wow mmmm,” and then wrote, “I’m chatting with Rod too he said same exact thing. Group chat? that was fun.” Victim A agreed, then sent the “Lauren” account an image that depicts Victim A’s torso, with his genitals exposed to the camera. The camera is pointing up from below Victim A’s genitals and Victim A has an erection. **WHITE**, still posing as “Lauren,” responded, “Rod didn’t see it.” Victim A told **WHITE** “i just feel wierd about him seeing it srly.” **WHITE** then convinced Victim A to allow “Lauren” to send the image to **WHITE**.

**WHITE**, posing as “Lauren,” persuaded, induced, enticed, and coerced Victim A to send two more images of himself involved in sexually explicit conduct on July 4 and July 5, 2015.

On July 15, 2015, **WHITE**, again posing as “Lauren,” engaged in an ooVoo chat conversation with Victim C (then a 12-year-old male), a friend of Victim A. **WHITE** wrote to Victim C that Victim A was not answering his messages. On July 23, 2015, Victim C informed **WHITE** that Victim A had blocked **WHITE**. In response, **WHITE** wrote, “well fine. tell him I’m gonna post his pics online for everyone to see including his contact info. ha!” **WHITE** then asked if Victim A “wanted proof” and sent an image depicting Victim A standing in front of the camera looking down toward the camera in the image. In the image, Victim A’s genitals are exposed and Victim A has an erection. Victim A appears to be fully nude in the image, with genitals, midsection and face visible in the image. Using Victim C’s account, Victim A wrote, “Please don’t do this we could both get in trouble btw it’s [Victim A].” **WHITE** then demanded, “talk to me on ur name!” Several minutes later, **WHITE** wrote to Victim C, “tell [Victim A] I’m not posting his pics.” Three days later, on July 26, 2015, **WHITE** asked Victim C if he wanted to group chat with Victim A.

**WHITE**, posing as “Lauren,” persuaded, induced, enticed, and coerced Victim A to send another image of himself involved in sexually explicit conduct on December 25, 2015.

On January 2, 2016, **WHITE**, still posing as “Lauren,” wrote to Victim A regarding Victim B (then a 12-year-old male), “did u see his jerkoff video he sent me?” Victim A responded, “no,” and **WHITE** wrote, “ill send it if u don’t tell him.” **WHITE** then sent Victim A two videos that depict Victim B, nude, standing and masturbating. The videos focus on Victim B’s genitals; Victim B’s legs and feet are also in the video. After sending the videos, **WHITE** wrote, “mmmm so hot,” and “love his pubes among other things.”

The images Victim A sent to **WHITE** as described above, as well as the videos of Victim B that **WHITE** sent to Victim A and the image of Victim A that **WHITE** sent to Victim C, constitute visual depictions of minors engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A). Because these sexually explicit images were sent via ooVoo, the images were transported or transmitted in or affecting interstate or foreign commerce.

**Other Victims**

Law enforcement executed search warrants on **WHITE's** Instagram and ooVoo accounts, and at his residence in Greenbelt, Maryland. From **WHITE's** residence, law enforcement recovered a Maxtor external hard drive with serial number F4KKG4CF194 and an Apple iPad mini with serial number DNQNC2NWX5MG that belonged to **WHITE**. On these devices were folders bearing the names of males and containing images of twelve identified victims between the ages of 12 and 14, including Victims A, B, and C, as well as images of three additional as yet unidentified victims who appear to be approximately the same age, all engaged in sexually explicit conduct.

\* \* \*

I have read this statement of facts, and have carefully reviewed it with my attorney. I acknowledge that it is true and correct.

1-19-17  
Date

Rodney Lee White  
Rodney Lee White

I am the attorney for Rodney Lee White. I have carefully reviewed the statement of facts with him.

1-19-17  
Date

Allan H. Rombro, Esq.  
Allan H. Rombro, Esq.